

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JOSE DAVID CHICA-HERNANDEZ,

*Plaintiff,*

-v-

ITALPRESSE U.S.A., INC. and  
ITALPRESSE S.P.A.,

*Defendants.*

**Civil Action No.:**

**2:17-CV-06422 (KAM)(VMS)**

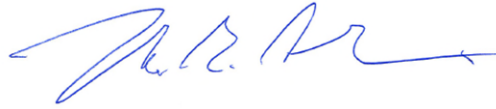
**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Sun Ah (Michelle) Park, dated May 17, 2021, and the exhibits annexed thereto, the accompanying Memorandum of Law in Support and Rule 56.1 Statement of Material Undisputed Facts, as well as upon all the pleadings herein, defendant ITALPRESSE S.P.A. by and through its attorneys of record, WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, will move this Honorable Court before Judge Kiyo A. Matsumoto, United States District Court, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, Courtroom 6C South on the date set by the Court as Counsel may be heard, for the for an Order pursuant to Fed. R. Civ. P. 56 granting defendant summary judgment and dismissing the instant action in its entirety, as well as such other and further relief as the Court finds appropriate.

Dated: White Plains, New York  
May 24, 2021

Respectfully Submitted,

WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP



By: \_\_\_\_\_  
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